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**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA**

In re:)	Case No.: 11-10391-LED
)	
JOHN E. HARNEY and)	Chapter 11
AIMEE M. HARNEY,)	
)	DATE: May 5, 2015
Debtors.)	TIME: 9:30 a.m.
)	

MOTION TO ADMINISTRATIVELY CLOSE CHAPTER 11 CASE

John E. Harney and Aimee M. Harney, (hereinafter, "Debtors"), by and through their attorney of record, David A. Riggi, Esq., hereby file this Motion to Administratively Close Chapter 11 Case (hereinafter, "Motion") pursuant to 11 U.S.C. § 350 and Local Rule of Bankruptcy Procedure Rule 3022.1. The proposed Order Administratively Closing Individual Chapter 11 Case is attached hereto as **Exhibit "A"**.

DATED this 2nd day of April, 2015.

Respectfully submitted,

/s/ David A. Riggi
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MEMORANDUM OF POINTS AND AUTHORITIES

Local Rule of Bankruptcy Procedure Rule 3022.1(e) states: “If the debtor proposes to close the case before plan payments have been completed, and intends to reopen the case after plan completion to obtain a discharge, the debtor shall file a motion to close the case and include in that motion the debtor’s intent to reopen” Bankruptcy Code section 350(a) states: “After an estate is fully administered and the court has discharged the trustee, the court shall close the case.” Although the Debtors are not seeking a final closing under this section, the authority to do an administrative closing is still within the purview of this provision. The Debtors’ Plan of Reorganization was confirmed on October 7, 2013. The Debtors intend to reopen the case for a final decree. The case has been fully administered and the Court can enter an order closing the case. The Debtors have complied with all U.S. Trustee reporting requirements and fees. There are no pending contested matters or adversary proceedings. The claims have all been paid or will be paid.

Accordingly, Debtors request that this Court grant this Motion to Administratively Close Chapter 11 Case.

DATED this 2nd day of April, 2015.

Respectfully submitted,

/s/ David A. Riggi

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